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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
All West Communications, Inc., Carbon/)	CC Docket No. 96-45
Emery Telcom, Inc., Central Utah)	
Telephone, Inc., Hanksville Telcom, Inc.,)	
Manti Telephone Company, Skyline)	
Telcom, UBET Telecom, Inc., and Qwest)	
Corporation)	
)	
Joint Petition for Waiver of the Definition)	
of "Study Area" Contained in Part 36,)	
Appendix-Glossary of the Commission's)	
Rules;)	
)	
Petition for Waiver of Section 61.41(c) and)	
(d), 69.3(e)(11) and 69.605(c) of the)	
Commission's Rules)	

**COMMENTS OF THE
UNITED STATES TELECOM ASSOCIATION**

The United States Telecom Association ("USTA")¹ hereby submits its comments in the above captioned proceeding² in support of the petitioners' requests for waiver of the definition of

¹ The United States Telecom Association, formerly the United States Telephone Association, is the nation's oldest trade organization for the local exchange carrier industry. USTA represents more than 1200 telecommunications companies worldwide that provide a full array of voice, data and video services over wireline and wireless networks. USTA members support the concept of universal service and are leaders in the deployment of advanced telecommunications capabilities to American and international markets.

² The Commission established the pleading cycle in this proceeding in its *Public Notice* in CC Docket No. 96-45, DA 00-2349, released October 18, 2000 (*"Notice"*). The Expedited Joint Petition for Waivers (*"Petition"*) was filed on October 6, 2000.

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"study area" in Part 36 of the Commission's rules;³ exemption from the price cap "all or nothing" rule;⁴ and additional waivers to permit them to operate their newly acquired exchanges under the interstate tariff of the National Exchange Carrier Association ("NECA") as average schedule companies.⁵

I. BACKGROUND

The *Petition* involves the sale of twelve Utah exchanges now owned by Qwest Corporation ("Qwest"),⁶ to seven Utah local exchange carriers ("LECs").⁷ The acquiring companies are:

All West Communications, Inc. ("All West"), a rural incumbent LEC serving approximately 4,100 access lines from two exchanges in northern Utah. It will acquire one exchange from Qwest serving approximately 1,800 access lines adjacent to its present serving area, and through grant of the requested waivers, seeks to add this exchange to its existing Utah study area.⁸ The expanded All West study area will thus serve approximately 5,900 access lines;

³ 47 C.F.R. Part 36 Appendix-Glossary.

⁴ 47 C.F.R. §61.41(c).

⁵ 47 C.F.R. §69.3(e)(11) pertains to the NECA tariff and §69.605(c) defines average schedule companies.

⁶ Qwest Corporation is the successor in interest to U.S. WEST Communications, Inc.

⁷ *Petition* at 1.

⁸ *Id.* at 4; Attachment I at 5.

Carbon/Emery Telcom, Inc. ("Carbon/Emery"), a new LEC formed as a wholly-owned subsidiary of Emery Telephone ("Emery"). Emery is a rural incumbent LEC serving approximately 5,300 access lines from six exchanges in central and eastern Utah. Carbon/Emery will acquire three exchanges from Qwest serving approximately 11,900 access lines contiguous to the present serving area of Emery, and through grant of the requested waivers seeks to add these exchanges to the existing Emery study area;⁹

Central Utah Telephone, Inc. ("Central"), a rural incumbent LEC serving approximately 1,600 access lines from six exchanges in central Utah. It will acquire one exchange from Qwest serving approximately 2,000 access lines contiguous to its presently served areas. Central seeks to add this exchange to its existing Utah study area through grant of the requested waivers.¹⁰ The expanded Central study area will thus serve approximately 3,600 access lines;

Hanksville Telcom, Inc. ("Hanksville"), a new LEC formed as a wholly owned subsidiary of Emery. It will acquire from Qwest a single exchange serving approximately 200 access lines adjacent to the area presently served by Emery in south central Utah.¹¹ Hanksville seeks to add this exchange to the existing Emery study area through grant of the requested waivers. The acquisitions of Carbon/Emery and Hanksville will expand the

⁹ *Petition* at 5; Attachment I at 5; *Notice*, fn. 1.

¹⁰ *Petition*. at 5; Attachment I at 5.

¹¹ *Petition* at 6; Attachment I at 5; *Notice*, fn. 1.

existing Emery study area to serve approximately 17,400 access lines.

Manti Telephone Company ("Manti") is a rural incumbent LEC serving approximately 1,600 access lines from a single exchange in central Utah. It will acquire from Qwest another exchange serving approximately 1,900 access lines adjacent to its present serving area,¹² and seeks to add this exchange to its existing Utah study area through grant of the requested waivers. The expanded Manti study area will thus serve approximately 3,500 access lines.

Skyline Telecom ("Skyline") is a rural incumbent LEC serving approximately 1,600 access lines in northwestern Utah. It will acquire from Qwest two exchanges serving approximately 1,400 access lines near its present serving area,¹³ and seeks to add these exchanges to its existing Utah study area through grant of the requested waivers. The expanded Skyline study area will thus serve approximately 3,000 access lines; and

UBET Telecom, Inc. ("UBET") is a wholly-owned subsidiary of Uintah Basin Telecommunications Association ("UBTA") which is a rural incumbent LEC serving approximately 3,200 access lines from four exchanges in northeastern Utah. It will acquire from Qwest three exchanges serving approximately 15,500 access lines close to

¹² *Petition* at 6; Attachment I at 5.

¹³ *Petition* at 6; Attachment I at 5-6.

the present UBTA serving area.¹⁴ UBET seeks to add the acquired exchanges to the existing study area of UBTA through grant of the requested waivers. The expanded UBTA study area will thus serve 18,700 access lines.

In the aggregate, with these acquisitions from Qwest, the acquiring petitioners will move from serving 17,400 access lines in rural Utah communities to serving 52,100 access lines. Together with Qwest, they seek grant of waiver of the Commission's study area rules in order to delete these areas from Qwest's Utah study area and add them to the study areas of the acquiring LECs.¹⁵ All West, Carbon/Emery, Central, Hanksville and UBET seek waiver of the Commission's price cap "all or nothing" rule¹⁶ to allow them to operate the acquired exchanges under rate-of-return regulation.¹⁷ Manti and Skyline seek waiver of the Commission's average schedule definition rule¹⁸ in order to operate their acquired exchanges as average schedule companies.¹⁹ Additionally, the acquiring LECs seek waiver, to the extent necessary, of the Commission's tariff pooling rules²⁰ so that they can participate in the interstate tariff of NECA.

USTA believes that petitioners have demonstrated good cause for grant of their requested

¹⁴ *Petition* at 7; Attachment I at 6.

¹⁵ *Petition* at 17.

¹⁶ 47 C.F.R. §61.41(C).

¹⁷ *Notice* at 1-2.

¹⁸ 47 C.F.R. §69.605.

¹⁹ *Notice* at 2.

²⁰ 47 C.F.R. §69.3(e)(11).

waivers, and, as explained further below, urges the Commission to expeditiously grant their requests.

II. THE COMMISSION'S TESTS FOR GRANTING A STUDY AREA WAIVER HAVE BEEN MET

The Commission's rules state that "(s)tudy area boundaries shall be frozen as they are on November 15, 1984."²¹ However, the Commission has granted numerous waivers from this rule where it determined that "special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest."²² The Commission normally applies a three prong standard in these instances.

First, the requested study area boundary change must not have an adverse impact on the Universal Service Fund ("USF").²³ Petitioners demonstrate that this condition will be met. They note that the Commission's rules require that a carrier acquiring exchanges from a non-affiliated carrier shall receive the same level of per-line support from the USF as the exchanges were eligible for before the transfer, and therefore they expect to receive the same level of support as Qwest currently receives for the acquired exchanges.²⁴ The amount of support they receive from

²¹ 47 C.F.R. Part 36, Appendix-Glossary.

²² Sully Buttes Telephone Cooperative, Inc. and Qwest Corporation Joint Petition for Waiver of Definition of "Study Area" Contained in Part 36, Appendix-Glossary of the Commission's Rules; and Sully Buttes Telephone Cooperative, Inc. Petition for Waiver of Sections 61.41(c) and (d) and 69.3(3)(11) of the Commission's Rules, *Order*, CC Docket No. 96-45, DA 00-1894, released August 18, 2000, ¶ 8 ("*Sully Buttes Order*").

²³ *Id.*

²⁴ *Petition*, at 16.

their pre-existing exchanges is not a factor.²⁵ Thus, the Commission's own rules lock in compliance with the first standard of its test.

Second, the state regulatory commission having jurisdiction over the area to be transferred does not oppose the change.²⁶ Petitioners have included as Attachment I the Orders of the Utah Public Service Commission (PSC) approving the sale of the subject exchanges from Qwest to the acquiring LECs.²⁷

Third, the transfer must serve the public interest. Petitioners explain that Utah customers have shown in public hearings held by the Utah PSC that they strongly support the acquisitions, and that the acquiring companies plan extensive facilities improvements in their new exchanges.²⁸ USTA adds that the increased size of the acquiring carriers' serving areas will avail them of scale and scope economies which will enable them to enhance the array of services provided to all their customers, and to do so more efficiently. USTA therefore believes that petitioners have demonstrated that the public interest will be served by allowing the transfers to proceed.

²⁵ *Petition* at 11, citing 47 C.F.R. §54.305.

²⁶ *Sully Buttes Order* at ¶ 8.

²⁷ *Petition* at 17; Attachment I.

²⁸ *Id.* at 17. For example, Carbon/Emery plans to spend over \$4 million in the first two years in its acquired exchanges to replace existing aerial and buried cable with new buried facilities and to add a fiber connection to the point of connection with the tandem switch, which will enable the provision of CLASS and digital subscriber line (DSL) services, as explained in Attachment C at 1.

III. THE PRICE CAP "ALL OR NOTHING" RULE SHOULD NOT APPLY TO THIS TRANSACTION

The Commission's primary concerns in enacting and enforcing §61.41(c) of its rules, the so-called "all or nothing" rule, is to prevent carriers from shifting costs from price cap regulated affiliates to other affiliates which may be the subject of cost plus, or rate-of-return regulation, on the one hand, and "gaming the system" on the other.²⁹ "Gaming" refers to a carrier building up its network under rate-of-return regulation, then changing to price cap regulation and reducing costs while keeping high rates in effect.

Petitioners explain that Qwest and the acquiring LECs have no affiliate relationship.³⁰ Any subsequent acquisition by Qwest of any of the subject exchange areas would require a waiver at that time. Petitioners also demonstrate that the acquiring LECs are of the class of carriers the Commission has found to not be price cap candidates.³¹ Therefore, and as the Commission found in the case of the recently approved request of Century Tel and GTE (now part of Verizon), there is no risk here of the dangers which the "all or nothing" rule ostensibly guards against.³² This waiver request should be quickly granted.

²⁹ See Century Tel of Northwest Arkansas, LLC, Century Tel of Central Arkansas, LLC, and GTE Arkansas Incorporated, GTE Midwest Incorporated, GTE Southwest Incorporated Joint Petition for Waiver of Definition of "Study Area" Contained in Part 36 Appendix Glossary of the Commission's Rules. Century Tel of Northwest Arkansas LLC and Century Tel of Central Arkansas, LLC Petition for Waiver of Sections 61.41(c) and 69.3(g)(2) of the Commission's Rules, *Memorandum Opinion and Order*, CC Docket No. 96-45, released June 27, 2000 ("Century/GTE Order"), ¶10.

³⁰ *Petition* at 9.

³¹ *Id.* at 8.

³² Century Tel/GTE Order, ¶21.

IV. NECA SHOULD BE ALLOWED TO ADMINISTER THE TARIFFS OF THE ACQUIRING LECS

Petitioners note that the Commission's rules may preclude common line tariff participation in the NECA tariff until July 1 of the year following completion of the transaction, and ask that if this is the case, waiver from the rule should be granted.³³ USTA agrees that no public interest would be served in requiring these LECs to file their own interstate tariffs to be in effect for only a few months until they can participate in the NECA tariff. They should be allowed to participate in the NECA tariff immediately, and this waiver request should also be quickly granted.

V. SKYLINE AND MANTI SHOULD BE ALLOWED TO OPERATE THEIR ACQUIRED EXCHANGES AS AVERAGE SCHEDULE COMPANIES

Skyline and Manti are average schedule companies under the Commission's rules.³⁴ They seek to operate their enlarged serving areas under average schedule status, noting that they meet the Commission's and NECA's standards for average schedule companies even with their newly acquired areas.³⁵ USTA agrees, and asks that the Commission also quickly grant this waiver request.

VI. EXPEDITED ACTION ON THE REQUESTED WAIVER IS NECESSARY

Petitioners filed their request for waiver of the Commission's rules on October 6, 2000. The Commission's *Notice* sets a pleading cycle under which comments are due by November 2,

³³ *Petition* at 14.

³⁴ 47 C.F.R. §69.605(c) defines an average schedule company as one participating in average schedule settlements on December 1, 1982.

³⁵ *Petition* at 11.

2000, and replies by November 13, 2000. Under this pleading schedule, it is not certain that the Commission will issue an order before January 1, 2001. This would be nearly three months after the parties sought their waiver. If indeed the waiver is found to be in the public interest, as USTA believes it is, then swift action by the Commission can only further serve the public interest. USTA urges the Commission to recognize the importance of acting quickly to help bring the benefits set forth in the *Petition* to the customers, present and future, of the acquiring LECs.

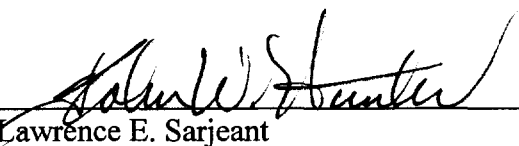
V. CONCLUSION

For the foregoing reasons, USTA urges the Commission to expeditiously approve the waivers of its rules as requested by All West, Carbon/Emery, Central, Hankville, Manti, Skyline, UBET, and Qwest in their *Petition*.

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November 2, 2000

CERTIFICATE OF SERVICE

I, Meena Joshi, do certify that on November 2, 2000, Comments Of The United States Telecom Association was either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the attached service list.



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